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April 21, 2022

VIA FACSIMILE - 267-299-5070

The Honorable Gene E.K. Pratter, U.S.D.J.
United States District Court
For the Eastern District of Pennsylvania
601 Market Street, Room 10613
Philadelphia, PA 19106

***Re: D.A. Nolt, Inc. vs. The City of Philadelphia and
The Philadelphia Municipal Authority
U.S.D.C. for the E.D. of PA, Civil Action No. 18-cv-04997-GEKP***

Dear Judge Pratter:

This firm is counsel for Plaintiff D.A. Nolt, Inc. (“Nolt”). I write in follow-up to the oral argument held by Your Honor on March 28, 2022 in this case. Counsel for Defendants concur with the contents of this letter.

By way of background, on or about January 4, 2022, Plaintiff D.A. Nolt, Inc., filed a motion for award of attorneys’ fees and expenses. The City filed an opposition on February 1, 2022 in which it alleged that certain of Nolt’s claimed expenses lacked “necessary detail or explanations.” See ECF No. 116 at pgs 30-31, 132-44. At oral argument, Your Honor asked Nolt to provide additional information to Defendants, and for counsel to confer on this topic. The parties undertook this exercise and reached an agreement, which is outlined herein.

For clarity purposes, enclosed please find Exhibits 12-17 from Defendants’ opposition with color coding and additional information. The City agrees to withdraw its objection **for lack of detail only** to the expenses highlighted in yellow on the attached, while Nolt agrees to withdraw its request for award of the expenses highlighted in red. This results in a reduction of Nolt’s expenses claimed by \$974.86. If Your Honor prefers that this agreement on expenses be memorialized in a different form, please advise.

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Additionally, in response to Your Honor's request that the Parties update the Court after their mediation before the Third Circuit, we report that the parties were unable to settle their dispute at this time.

It is counsel's understanding that this completes all requested supplemental information.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jennifer R. Budd".

JENNIFER R. BUDD

JRB:bb

Enclosures

cc: Michael Pfautz, Esq. (via e-mail)
Lydia Furst, Esq. (via e-mail)